

Regarding BPL: The report by the United Power Line Council that "there has been no interference reported" is either premature or inaccurate. Preliminary tests by the American Radio Relay League indicate the potential for interference to commercial, government, and amateur services in the 1 to 80 MHz part of the spectrum will be significant. My training as an EMC engineer also leads me to believe it will be incorrect to apply Part 15 unintentional emitter rules to this technology. It does not involve a point source, but a network of widely-distributed wires (the power grid) that will serve as antennas. At some frequencies, it will be nearly impossible to get out of the near field of these radiators. Thus, interference will be unavoidable. Atmospherically-propagated signals from BPL systems will also be detectable at great distances, although they may be difficult to distinguish from other kinds of broadband noise.

I believe the FCC should disallow this use of the radio spectrum and that it should not increase the field strengths allowed unintentional emitters simply to facilitate BPL.